

JUDGE SCHEINDLIN

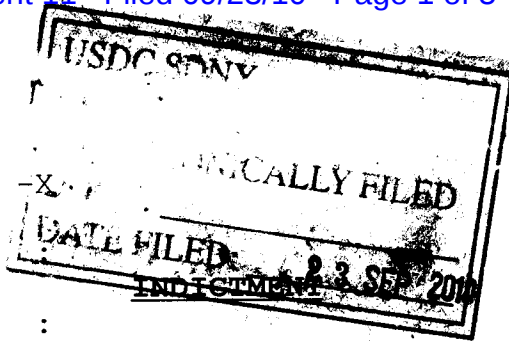
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JORGE HERNANDO YEPES-MORALES,

Defendant.



10 Cr.

10 CRIM 867

COUNT ONE

The Grand Jury charges:

1. From at least in or about December 2008 up to and including in or about September 2009, in the Southern District of New York and elsewhere, JORGE HERNANDO YEPES-MORALES, the defendant, and others known and unknown, unlawfully, wilfully and knowingly did combine, conspire, confederate and agree together and with each other to violate Title 18, United States Code, Section 1956(a)(1)(A)(i).

2. It was a part and an object of the conspiracy that JORGE HERNANDO YEPES-MORALES, the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, knowing that the property involved in certain financial transactions, to wit, cash and wire transfers, represented the proceeds of some form of unlawful activity, unlawfully, willfully, and knowingly would and did conduct and attempt to conduct such financial transactions which in fact involved the proceeds of specified unlawful activity, to wit, the proceeds of illegal narcotics transactions, with the intent to

promote the carrying on of that specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

OVERT ACT

3. In furtherance of said conspiracy and to effect the illegal objects thereof, the following overt act, among others, were committed in the Southern District of New York and elsewhere:

a. On or about February 11, 2009, JORGE HERNANDO YEPES-MORALES, the defendant, traveled through the Southern District of New York to distribute a sum of narcotics proceeds to an undercover officer ("UC").

COUNT TWO

The Grand Jury further charges:

4. From at least in or about December 2008 up to and including in or about September 2009, in the Southern District of New York and elsewhere, JORGE HERNANDO YEPES-MORALES, the defendant, unlawfully, wilfully and knowingly did travel in interstate and foreign commerce, and use and cause to be used facilities in interstate commerce, with the intent to distribute the proceeds of an unlawful activity, and to promote, manage, establish, carry on, and facilitate the carrying on of an unlawful activity, to wit, money laundering activity, in violation of Title 18, United States Code, Sections 1956 and

1957, and narcotics trafficking activity, in violation of Title 21, United States Code, Sections 812, 841, and 846, and thereafter did perform and attempt to perform an act, and aid and abet the performance of said act, to distribute the proceeds of said unlawful activities, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of said unlawful activities, to wit, on or about February 11, 2009, YEPES-MORALES traveled from Connecticut to New Jersey, via the Southern District of New York, to distribute a sum of narcotics proceeds to a UC.

(Title 18, United States Code, Section 1952.)

FORFEITURE ALLEGATION: COUNT ONE

5. As the result of committing the money laundering offense alleged in Count One of this Indictment, JORGE HERNANDO YEPES-MORALES, the defendant, shall forfeit to the United States pursuant to Title 18, United States Code, Section 982, all property, real and personal, involved in the money laundering offense and all property traceable to such property, including but not limited to the following:

a. A sum of money equal to \$139,980 in United States currency.

Substitute Asset Provision

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. § 982(b), to seek forfeiture of any other property of said defendant, up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 982 and 1956.)


FOREPERSON


PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JORGE HERNANDO YEPES-MORALES,

Defendants.

INDICTMENT

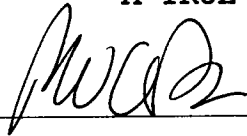
10 Cr.

(Title 18, United States Code,
Sections 1952 and 1956(h).)

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.

9/23/10
All DJ Ref 11-1-87 This case
is assigned to Judge Scheer for
all purposes. Mr. Judge